

EXHIBIT “A”

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES WITH FEE APPLICATIONS

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

CATEGORY OF TIMEKEEPER (using categories already maintained by the firm)		BLENDED HOURLY RATE	
		BILLED OR COLLECTED Firm or offices for preceding year, excluding bankruptcy	BILLED In this fee application
Delete	Sr./Equity Partner/Shareholder	\$1,046.73	\$1,085.00
Delete	Jr./Equity Partner/Shareholder	\$696.12	\$853.28
Delete	Counsel	\$712.25	
Delete	Sr. Associate (7 or more years since first admission)		
Delete	Associate (4-6 years since first admission)	\$592.40	
Delete	Jr. Associate (1-3 years since first admission)		
Delete	Staff Attorney		
Delete	Contract Attorney		
Delete	Paralegal	\$246.16	\$200.00
Delete	All attorneys aggregated (excluding travel time)		\$1,019.71
Add	<i>Click Add button to add additional timekeeper category</i>		
	All timekeepers aggregated	\$654.00	\$1,015.49

Case Name: LTL Management LLC
Case Number: 21-30589 (MBK) (Bankr. D.N.J.)
Applicant's Name: Massey & Gail LLP
Date of Application: 11/30/2022
Interim or Final: Interim

EXHIBIT “B”

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION

	NAME	TITLE OR POSITION	DEPARTMENT, GROUP, OR SECTION	DATE OF FIRST ADMISSION ¹	FEES BILLED	HOURS BILLED	HOURLY RATE BILLED		NUMBER OF RATE INCREASES
					IN THIS APPLICATION	IN THIS APPLICATION	IN THIS APPLICATION	IN FIRST INTERIM APPLICATION	SINCE CASE INCEPTION
Delete	Jonathan Massey	Sr. Partner		04/01/1992	\$361,196.50	332.9	\$1,085.00	\$1,065.00	1
Delete	Rachel Morse	Jr. Partner		11/08/2007	\$66,090.50	82.1	\$805.00	\$785.00	1
Delete	Matthew Collette	Jr. Partner		12/07/1988	\$45,347.50	48.5	\$935.00	\$895.00	1
Delete	Robert Aguirre	Paralegal		n/a	\$480.00	2.4	\$200.00		
Delete	Jonathan Massey (travel)	Sr. Partner (travel)		04/01/1992					
Add	Click Add button to add additional timekeeper								
¹ If applicable									

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EXHIBIT “C”



**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Order Filed on
December 17, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

<p>GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Matthew I.W. Baker, Esq. dstolz@genovaburns.com dclarke@genovaburns.com mbaker@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i></p>	<p>BROWN RUDNICK LLP David J. Molton, Esq. Robert J. Stark, Esq. Michael Winograd, Esq. Jeffrey L. Jonas, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com jjonas@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Sunni P. Beville, Esq. sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
<p>BAILEY GLASSER LLP Brian A. Glasser, Esq. Thomas B. Bennett, Esq. bglasser@baileyglasser.com tbennett@baileyglasser.com 105 Thomas Jefferson St. NW, Suite 540 Washington, DC 20007 Tel: (202) 463-2101 Fax: (202) 463-2103 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>	<p>OTTERBOURG PC Melanie L. Cyganowski, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. mcyanowski@otterbourg.com asilverstein@otterbourg.com jfeeney@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>

<p>PARKINS LEE & RUBIO LLP Leonard M. Parkins, Esq. Charles M. Rubio, Esq. lparkins@parkinslee.com crubio@parkinslee.com Pennzoil Place 700 Milan St., Suite 1300 Houston, TX 77002 Tel: (713) 715-1666 <i>Proposed Special Counsel to the Official Committee of Talc Claimants</i></p>	<p>MASSEY & GAIL LLP Jonathan S. Massey, Esq. jmassey@masseygail.com 100 Main Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i></p>
<p>In re:</p> <p>LTL MANAGEMENT, LLC,</p> <p style="text-align: right;">Debtor.</p>	<p>Chapter 11</p> <p>Case No.: 21-30589(MBK)</p> <p>Honorable Michael B. Kaplan</p>

**REVISED ORDER AUTHORIZING RETENTION AND EMPLOYMENT OF
MASSEY & GAIL LLP AS SPECIAL COUNSEL TO THE OFFICIAL COMMITTEE OF
TALC CLAIMANTS EFFECTIVE AS OF NOVEMBER 15, 2021**

The relief set forth on the following pages is **ORDERED**.

DATE: December 17, 2021


Honorable Michael B. Kaplan
United States Bankruptcy Judge

Upon the applicant's request for authorization to retain and employ Massey & Gail LLP as special counsel to the Official Committee of Talc Claimants in the above-captioned case, effective as of November 15, 2021, it is hereby **ORDERED**:

1. The applicant is authorized to retain and employ the above party in the professional capacity noted. The professional's address is:

Massey & Gail LLP
1000 Maine Ave. SW, Suite 450
Washington, D.C. 20024

2. Compensation will be paid in such amounts as may be allowed by the Court on proper application(s).
3. If the professional requested a waiver as noted below, it is ☐ Granted ☐ Denied.

☐ Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.

☐ Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.
4. The effective date of retention and employment is November 15, 2021.
5. Further terms of this Order shall be as follows:
 - (i) Massey & Gail LLP will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any of Massey & Gail's fee applications in this case;
 - (ii) Massey & Gail LLP will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines");
 - (iii) Massey & Gail LLP will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category");
 - (iv) Massey & Gail will provide any and all monthly fee statements, interim fee applications, and final fee applications in "LEDES" format to the United States Trustee; and
 - (v) any and all compensation to be paid to Massey & Gail for services rendered on the Talc

Committee's behalf shall be fixed by application to this Court in accordance with Sections 330 and 331 of the Bankruptcy Code, such Federal Rules and Local Rules as may then be applicable, and any orders entered in this case governing the compensation and reimbursement of professionals for services rendered and charges and disbursements incurred.

EXHIBIT “D”

SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

(See Guidelines ¶ C.8. for project category information.)

	PROJECT CATEGORY	HOURS BUDGETED¹	FEES BUDGETED¹	HOURS BILLED	FEES SOUGHT
	Asset Analysis and Recovery				
	Asset Disposition				
	Assumption and Rejection of Leases and Contracts				
	Avoidance Action Analysis				
	Budgeting (Case)				
	Business Operations				
	Case Administration			98.00	\$94,658.00
	Claims Administration and Objections			2.20	\$1,771.00
	Corporate Governance and Board Matters				
	Employee Benefits and Pensions				
	Employment and Fee Applications			13.70	\$12,428.50
	Employment and Fee Application Objections				
	Financing and Cash Collateral				
	Litigation: Contested Matters and Adversary Proceedings (not otherwise within a specific project category) - identify each separately by caption and adversary number, or title of motion or application and docket number				
Delete	Committee's motion to dismiss and related contested matters			272.90	\$282,521.50
Add	<i>Click Add button to add a litigation entry</i>				
	Meetings and Communications with Creditors				
	Non-Working Travel			7.40	\$4,014.50
	Plan and Disclosure Statement			8.80	\$9,548.00
	Real Estate				
	Relief from Stay and Adequate Protection			70.30	\$72,187.50
	Reporting				
	Tax				
	Valuation				
	TOTAL				
¹ If applicable					

Case Name: LTL Management LLC
Case Number: 21-30589 (MBK) (Bankr. D.N.J.)
Applicant's Name: Massey & Gail LLP
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EXHIBIT D -2

SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY

(See Guidelines ¶ C.8. for project category information.)

	CATEGORY	AMOUNT
	Copies	
	Outside Printing	
	Telephone	
	Facsimile	
	Online Research	
	Delivery Services/Couriers	
	Postage	
	Local Travel	
	Out-of-Town Travel:	
	(a) Transportation	\$413.82
	(b) Hotel	
	(c) Meals	\$86.74
	(d) Ground Transportation	\$260.31
Delete	(e) Other (please specify)	
Add	Click Add button to add an out of town travel category	
	Meals (local)	
	Court Fees	
	Subpoena Fees	
	Witness Fees	
	Deposition Transcripts	
	Trial Transcripts	
	Trial Exhibits	
	Litigation Support Vendors	
	Experts	
	Investigators	
	Arbitrators/Mediators	
Delete	NJ Attorney Fees	\$311.06
Add	Click Add button to add another category	

Case Name: LTL Management LLC
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Applicant's Name: Massey & Gail LLP
Date of Application: 11/30/2022
Interim or Final: Interim

EXHIBIT “E”

EXHIBIT E

SUMMARY COVER SHEET OF FEE APPLICATION

Name of applicant	Massey & Gail LLP
Name of client	Official Committee of Talc Claimants
Time period covered by this application	Start 6-01-2022 End 9-30-2022
Total compensation sought this period	\$477,129.00
Total expenses sought this period	\$1,071.93
Petition date	10-14-21
Retention date	11-15-21
Date of order approving employment	12-17-21
Total compensation approved by interim order to date	\$1,787,754.63
Total expenses approved by interim order to date	\$10,239.00
Total allowed compensation paid to date	\$1,787,754.63
Total allowed expenses paid to date	\$10,239.00
Blended rate in this application for all attorneys	\$1,019.71
Blended rate in this application for all timekeepers	\$1,015.49
Compensation sought in this application already paid pursuant to a monthly compensation order but not yet allowed	\$0.00
Expenses sought in this application already paid pursuant to a monthly compensation order but not yet allowed	\$0.00
Number of professionals included in this application	4
If applicable, number of professionals in this application not included in staffing plan approved by client	
If applicable, difference between fees budgeted and compensation sought for this period	
Number of professionals billing fewer than 15 hours to the case during this period	1
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application	<input checked="" type="radio"/> yes <input type="radio"/> no <div style="text-align: right;">\$466,815.00</div>

Case Name: LTL Management LLC
Case Number: 21-30589 (MBK) (Bankr. D.N.J.)
Applicant's Name: Massey & Gail LLP
Date of Application: 11/30/2022
Interim or Final: Interim

EXHIBIT “F”

50 E. Washington St.
Suite 400
Chicago, IL 60602
(312) 283-1590

**MASSEY
& GAIL** LLP

1000 Maine Ave. SW
Suite 450
Washington, D.C. 20024
(202) 652-4511

PRIVILEGED & CONFIDENTIAL

August 15, 2022

Official Committee of Talc Claimants
In re LTL Management, LLC, No. 21-30589
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 07-01-2022 - 07-31-2022

RE: LTL Management Bankruptcy

Expenses

Expense	Description	Amount
E124 - Other	New Jersey Lawyers' Fund - required payment of 2022 annual assessment fees.	311.06
	Total Expenses	311.06

50 E. Washington St.
Suite 400
Chicago, IL 60602
(312) 283-1590

**MASSEY
& GAIL**_{LLP}

1000 Maine Ave. SW
Suite 450
Washington, D.C. 20024
(202) 652-4511

PRIVILEGED & CONFIDENTIAL

October 11, 2022

Official Committee of Talc Claimants
In re LTL Management, LLC, No. 21-30589
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 09-01-2022 - 09-30-2022

RE: LTL Management Bankruptcy

Expenses

Expense	Description	Amount
E110 - Out of town travel	JSM - 9/18 flight to Philadelphia to attend Third Circuit oral argument.	413.82
E110 - Out of town travel	JSM - meals while in Philadelphia to attend Third Circuit oral argument on 9/19.	86.74
E110 - Out of town travel	JSM - local transportation while attending the 9/19 Third Circuit oral argument in Philadelphia.	69.31
E110 - Out of town travel	JSM - Amtrak transportation back after attendance at the 9/19 Third Circuit oral argument in Philadelphia.	191.00
Total Expenses		760.87

EXHIBIT “G”

50 E. Washington St.
Suite 400
Chicago, IL 60602
(312) 283-1590



1000 Maine Ave. SW
Suite 450
Washington, D.C. 20024
(202) 652-4511

PRIVILEGED & CONFIDENTIAL

July 18, 2022

Official Committee of Talc Claimants

In re LTL Management, LLC, No. 21-30589
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 06-01-2022 - 06-30-2022

RE: LTL Management Bankruptcy

Time Details

Date	Professional	Task	Hours	Rate	Amount
06-01-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,085.00	217.00
		Teleconference with David Frederick re CA3 briefing and strategy.			
06-01-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,085.00	434.00
		Teleconference with Deepak Gupta re CA3 briefing and strategy.			
06-01-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,085.00	542.50
		Email communication with TCC counsel regarding CA3 briefing and strategy.			
06-01-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	1,085.00	1,085.00
		Zoom with co-appellants Arnold & Itkin, Aylstock, and individual appellants represented by Deepak Gupta to discuss CA3 briefs on motion-to-dismiss appeal.			
06-01-2022	JSM	B320 - Plan and Disclosure Statement (including Business Plan)	2.70	1,085.00	2,929.50
		Zoom with committee representatives and TCC counsel to discuss development of TCC reorganization plan.			
06-02-2022	JSM	B110 - Case Administration	1.40	1,085.00	1,519.00
		Zoom with committee representatives and TCC counsel to discuss legal strategy and next steps in case.			
06-02-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	1,085.00	759.50
		Teleconference with TCC counsel regarding revisions to CA3 brief.			
06-02-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,085.00	434.00
		Email communication with counsel at Kellogg Hansen re substance of arguments to include in CA3 briefs.			
06-02-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.10	1,085.00	2,278.50
		Drafting insert to statement of the case of CA3 brief.			
06-03-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.20	1,085.00	3,472.00

Date	Professional	Task	Exhibit A through H	Page 20 of 48	Hours	Rate	Amount
			assumption / rejection motions)				
06-03-2022	JSM	Drafting insert to statement of the case of CA3 brief.	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,085.00	434.00
06-03-2022	RSM	Drafting email to counsel for co-appellants re CA3 briefing strategy and coordination.	B160 - Fee/Employment Application		0.70	805.00	563.50
06-03-2022	RSM	Worked on exhibits and backup for monthly interim fee application.	B160 - Fee/Employment Application		0.40	805.00	322.00
06-03-2022	RSM	Correspondence with colleagues re work on monthly interim fee application.	B160 - Fee/Employment Application		0.10	805.00	80.50
06-04-2022	JSM	Correspondence with US Trustee re monthly interim fee application support materials.	B160 - Fee/Employment Application		1.10	1,085.00	1,193.50
06-06-2022	JSM	Reviewing May 2022 Massey & Gail invoice for monthly interim fee application.	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,085.00	542.50
06-06-2022	JSM	Reviewing Diocese of Rochester order by Bankr WDNY of 5/23/2022 denying stay relief, with an eye toward its implications for instant proceeding.	B110 - Case Administration		0.70	1,085.00	759.50
06-06-2022	JSM	Zoom with TCC executive committee regarding legal strategy and next steps.	B140 - Relief from Stay / Adequate Protection Proceedings		2.20	1,085.00	2,387.00
06-07-2022	JSM	Reviewing bankruptcy court record for factual material to include in CA3 brief on preliminary injunction issues.	B110 - Case Administration		0.80	1,085.00	868.00
06-07-2022	JSM	Drafting comments on status report for submission to Bankruptcy Court on June 10 regarding next steps in proceeding.	B140 - Relief from Stay / Adequate Protection Proceedings		2.30	1,085.00	2,495.50
06-07-2022	JSM	Drafting inserts for CA3 appellate brief on preliminary injunction issues.	B160 - Fee/Employment Application		1.80	1,085.00	1,953.00
06-07-2022	RSM	Drafting second interim fee application.	B110 - Case Administration		0.20	805.00	161.00
06-07-2022	RSM	Reviewed Debtor's recent court filing.	B160 - Fee/Employment Application		0.20	805.00	161.00
06-08-2022	JSM	Worked on monthly fee application.	B190 - Other Contested Matters (excluding assumption / rejection motions)		5.60	1,085.00	6,076.00
06-08-2022	JSM	Revising CA3 brief in motion to dismiss appeal.	B110 - Case Administration		0.50	1,085.00	542.50
06-08-2022	JSM	Zoom with TCC counsel to discuss legal strategy and next steps.	B110 - Case Administration		1.60	1,085.00	1,736.00
06-08-2022	JSM	Zoom with TCC representatives to discuss legal strategy and next steps.	B110 - Case Administration		0.60	1,085.00	651.00
06-09-2022	JSM	Drafting comments on status report for submission to Bankruptcy Court on June 10 regarding next steps in proceeding.	B110 - Case Administration		0.60	1,085.00	651.00
06-09-2022	JSM	Drafting comments on status report for submission to Bankruptcy Court on June 10 regarding next steps in proceeding.	B190 - Other Contested Matters (excluding assumption / rejection motions)		6.20	1,085.00	6,727.00
06-09-2022	JSM	Revising CA3 brief in motion to dismiss appeal.	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.20	1,085.00	1,302.00
06-09-2022	JSM	Telephone conference with co-appellants and TCC counsel to discuss CA3 briefing strategies.	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,085.00	434.00

Date	Professional	Task Exhibit A through H	Page 21 of 48	Hours	Rate	Amount
		Email communication with TCC counsel to discuss CA3 briefing strategies.				
06-09-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,085.00	325.50
		Email communication with counsel for co-appellants to discuss CA3 briefing strategies.				
06-10-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,085.00	325.50
		Telephone conference with counsel for co-appellants to discuss procedural order issued by CA3 to govern motion-to-dismiss appeal.				
06-10-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,085.00	325.50
		Email communication with TCC counsel regarding procedural order issued by CA3 to govern motion-to-dismiss appeal.				
06-10-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	1,085.00	542.50
		Telephone conference with TCC counsel to discuss motion to lift stay to be filed June 22.				
06-10-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		5.90	1,085.00	6,401.50
		Revising CA3 brief in motion to dismiss appeal.				
06-11-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		2.90	1,085.00	3,146.50
		Drafting motion to lift stay to be filed June 22.				
06-11-2022	JSM	B110 - Case Administration		0.60	1,085.00	651.00
		Zoom with TCC counsel regarding status report filed by J&J.				
06-11-2022	JSM	B110 - Case Administration		0.30	1,085.00	325.50
		Reviewing status report filed by J&J for June 14 conference.				
06-11-2022	JSM	B110 - Case Administration		0.40	1,085.00	434.00
		Reviewing bullet points to be presented by TCC counsel at June 14 status conference regarding estimation and next steps for case.				
06-11-2022	JSM	B110 - Case Administration		0.30	1,085.00	325.50
		Composing suggestions for bullet points to be presented by TCC counsel at June 14 status conference regarding estimation and next steps for case.				
06-11-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,085.00	434.00
		Adding record cites to CA3 brief from material designated as part of the record on appeal.				
06-11-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,085.00	217.00
		Telephone conference with Mike Winograd of Brown Rudnick re CA3 appeal legal issues.				
06-12-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	1,085.00	542.50
		Telephone conference with TCC appellate team regarding CA3 brief and legal arguments.				
06-12-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		4.30	1,085.00	4,665.50
		Drafting motion to lift stay to be filed June 22.				
06-13-2022	JSM	B160 - Fee/Employment Application		0.40	1,085.00	434.00
		Revising May 2022 fee application.				
06-13-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.70	1,085.00	1,844.50
		Email communication with TCC counsel and representatives regarding CA3 briefing procedure.				
06-13-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.30	1,085.00	1,410.50
		Telephone communication with TCC counsel and representatives regarding CA3 briefing procedure.				
06-13-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.60	1,085.00	1,736.00
		Telephone communication with co-appellants regarding CA3 briefing procedure.				
06-13-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.30	1,085.00	2,495.50

Date	Professional	Task Exhibit A through H	Page 22 of 48	Hours	Rate	Amount
		Drafting inserts on factual issues for inclusion in CA3 brief.				
06-14-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		3.40	1,085.00	3,689.00
		Drafting inserts on factual issues for inclusion in CA3 brief.				
06-14-2022	JSM	B160 - Fee/Employment Application		0.20	1,085.00	217.00
		Sending May 2022 fee materials to US Trustee.				
06-14-2022	JSM	B160 - Fee/Employment Application		0.20	1,085.00	217.00
		Sending May 2022 fee materials to Fee Examiner.				
06-14-2022	JSM	B110 - Case Administration		3.80	1,085.00	4,123.00
		Attending status conference remotely via CourtSolutions.				
06-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		3.20	1,085.00	3,472.00
		Drafting inserts on factual issues for inclusion in CA3 brief.				
06-15-2022	JSM	B110 - Case Administration		0.80	1,085.00	868.00
		Zoom with TCC counsel regarding 6/14 omnibus hearing and next steps in case.				
06-15-2022	JSM	B110 - Case Administration		1.50	1,085.00	1,627.50
		Zoom with TCC representatives and members regarding legal strategy and next steps in case.				
06-15-2022	JSM	B160 - Fee/Employment Application		0.70	1,085.00	759.50
		Revising second interim fee application for submission to TCC.				
06-15-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		2.80	1,085.00	3,038.00
		Drafting jurisdictional argument with respect to lift-stay motion and why bankruptcy court has jurisdiction to modify the injunction during pendency of CA3 appeal.				
06-16-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.80	1,085.00	1,953.00
		Reviewing and analyzing latest version of CA3 brief.				
06-17-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	1,085.00	542.50
		Zoom with TCC counsel regarding edits to draft CA3 brief.				
06-17-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.50	1,085.00	2,712.50
		Composing edits to draft CA3 brief.				
06-18-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		3.20	1,085.00	3,472.00
		Composing edits to draft CA3 brief.				
06-21-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.70	805.00	563.50
		Correspondence with co-counsel re stay lifting requests.				
06-21-2022	RSM	B160 - Fee/Employment Application		0.10	805.00	80.50
		Correspondence with J. Massey re interim fee application.				
06-21-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.20	1,085.00	2,387.00
		Drafting edits on latest version of CA3 brief in motion-to-dismiss appeal.				
06-21-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.90	1,085.00	2,061.50
		Reviewing latest version of CA3 brief in motion-to-dismiss appeal.				
06-21-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	1,085.00	651.00
		Telephone conference with TCC counsel regarding latest version of CA3 brief in motion-to-dismiss appeal.				
06-21-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,085.00	325.50
		Email communication with TCC counsel regarding latest version of CA3 brief in motion-to-dismiss appeal.				
06-21-2022	JSM	B110 - Case Administration		0.30	1,085.00	325.50
		Zoom with Jeff Lamken regarding preparations for July 6 hearing and lift stay motion.				
06-21-2022	JSM	B110 - Case Administration		1.40	1,085.00	1,519.00

Date	Professional	Task	Exhibit A through H	Page 23 of 48	Hours	Rate	Amount
06-22-2022	JSM	Zoom with TCC counsel and representatives regarding preparations for July 6 hearing and lift stay motion.			1.10	1,085.00	1,193.50
06-22-2022	JSM	Reviewing lift stay motion for July 6 status conference.			0.30	1,085.00	325.50
06-23-2022	JSM	Composing comments on lift stay motion for July 6 status conference.			0.30	1,085.00	325.50
06-23-2022	JSM	Email communication with TCC counsel regarding lift stay motions filed by other parties.			1.40	1,085.00	1,519.00
06-24-2022	JSM	Reviewing lift stay motions filed by other parties.			0.60	1,085.00	651.00
06-24-2022	JSM	Zoom with TCC counsel to discuss preparations for July 6 status conference			1.60	1,085.00	1,736.00
06-24-2022	JSM	Reviewing latest version of CA3 brief in motion-to-dismiss appeal.			2.30	1,085.00	2,495.50
06-24-2022	RSM	Drafting edits on latest version of CA3 brief in motion-to-dismiss appeal.			0.70	805.00	563.50
06-25-2022	JSM	Conference with co-counsel re strategy and preparation for July 6 court hearing.			1.60	1,085.00	1,736.00
06-25-2022	JSM	Revising latest draft of CA3 appellate brief.			1.30	1,085.00	1,410.50
06-27-2022	JSM	Reviewing draft appellate brief from Arnold & Itkin in CA3 motion-to-dismiss appeal.			1.40	1,085.00	1,519.00
06-27-2022	JSM	Reviewing draft CA3 brief from mesothelioma claimants represented by Deepak Gupta.			1.10	1,085.00	1,193.50
06-28-2022	JSM	Email communication with TCC counsel regarding CA3 appeal.			1.30	1,085.00	1,410.50
06-28-2022	JSM	Email communication with TCC counsel regarding filing of CA3 appeal brief.			0.30	1,085.00	325.50
06-29-2022	JSM	Telephone conference with counsel for LTL and TCC counsel regarding CA3 joint appendix.			1.40	1,085.00	1,519.00
06-29-2022	JSM	Drafting revisions to CA3 brief in motion to dismiss appeal.			0.90	1,085.00	976.50
06-29-2022	JSM	Zoom with TCC outside counsel to discuss legal strategy for issues raised at July 6 and July 26 status conferences.			1.30	1,085.00	1,410.50
06-29-2022	JSM	Zoom with TCC members, representatives, and outside counsel to discuss legal strategy for next steps in bankruptcy case.			0.70	1,085.00	759.50
06-29-2022	RSM	Reviewing employment and bonus agreements of LTL officers for possible use in CA3 appeal.			0.80	805.00	644.00
06-29-2022	RSM	Conference with co-counsel re mediation issues and upcoming court hearing.			0.20	805.00	161.00

Date	Professional	Task	Exhibit A through H	Page 24 of 48	Hours	Rate	Amount
		Correspondence with co-counsel re mediation issues.					
06-29-2022	RSM	B110 - Case Administration			1.30	805.00	1,046.50
		Conference with committee members, committee representatives, and co-counsel re case status and strategy (including appeal, estimation, exclusivity, upcoming court hearing).					
06-30-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.80	1,085.00	868.00
		Final review of CA3 brief in motion-to-dismiss appeal before being sent to printer.					
06-30-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.70	1,085.00	759.50
		Reviewing LTL opposition to motion for lifting/modifying stay order.					
					Total		129,447.50

Time Summary

Professional	Hours	Amount
Jonathan Massey	115.30	125,100.50
Rachel Morse	5.40	4,347.00
Total		129,447.50

Total for this Invoice 129,447.50

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PRIVILEGED & CONFIDENTIAL

August 15, 2022

Official Committee of Talc Claimants

In re LTL Management, LLC, No. 21-30589
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 07-01-2022 - 07-31-2022

RE: LTL Management Bankruptcy

Time Details

Date	Professional	Task	Hours	Rate	Amount
07-01-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings	3.20	1,085.00	3,472.00
07-01-2022	RSM	Drafting insert for reply brief in response to LTL opposition to motion for lifting/modifying stay order. B140 - Relief from Stay / Adequate Protection Proceedings	0.10	805.00	80.50
07-01-2022	RSM	Reviewed correspondence with Court re hearing on preliminary injunction issues. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	805.00	241.50
07-04-2022	JSM	Reviewed appellate court briefing paper. B140 - Relief from Stay / Adequate Protection Proceedings	3.60	1,085.00	3,906.00
07-05-2022	JSM	Drafting insert to reply brief in support of lift stay motion. B140 - Relief from Stay / Adequate Protection Proceedings	2.20	1,085.00	2,387.00
07-05-2022	JSM	Drafting insert to reply brief in support of lift stay motion. B110 - Case Administration	1.50	1,085.00	1,627.50
07-05-2022	JSM	Zoom with TCC counsel and committee representatives to discuss legal strategy, next steps, and plans for July 26 status conference. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,085.00	325.50
07-05-2022	RSM	Email communication with TCC counsel regarding CA3 appeal. B110 - Case Administration	0.10	805.00	80.50
07-05-2022	RSM	Correspondence with co-counsel re July 6 Court hearing. B110 - Case Administration	0.20	805.00	161.00
07-05-2022	RA	Conference with colleagues re case management tasks for R. Aguirre. B110 - Case Administration	0.40	200.00	80.00
		Meeting with J. Massey and R. Morse.			

Date	Professional	Task	Exhibit	Att. Enough	Page	Hours	Rate	Amount
07-06-2022	RSM	B110 - Case Administration			26 of 48	0.60	805.00	483.00
		Attended Court status conference re preliminary injunction issues, mediation, and the path of the case going forward.						
07-06-2022	RSM	B110 - Case Administration				0.90	805.00	724.50
		Conference with co-counsel and committee representatives re court hearing and strategy going forward.						
07-06-2022	JSM	B110 - Case Administration				0.60	1,085.00	651.00
		Attending status conference with bankruptcy court via zoom.						
07-06-2022	JSM	B110 - Case Administration				0.90	1,085.00	976.50
		Zoom conference with TCC counsel and representatives to discuss July 6 status conference and next steps.						
07-07-2022	JSM	B320 - Plan and Disclosure Statement (including Business Plan)				0.50	1,085.00	542.50
		Zoom with TCC representatives and counsel to discuss plan formulation issues.						
07-07-2022	RSM	B300 - ***DO NOT USE*** Claims and Plan				2.20	805.00	1,771.00
		Conference with co-counsel and committee representatives re potential plan structure.						
07-08-2022	JSM	B110 - Case Administration				1.00	1,085.00	1,085.00
		Zoom with TCC counsel regarding mediation strategy.						
07-08-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings				0.80	1,085.00	868.00
		Conference call with TCC counsel and representatives regarding strategy for PI modification at July 26 status conference.						
07-08-2022	JSM	B110 - Case Administration				0.60	1,085.00	651.00
		Zoom with TCC counsel and TCC representatives regarding status of mediation and strategy for mediation.						
07-08-2022	RSM	B110 - Case Administration				0.90	805.00	724.50
		Conference with co-counsel and committee representatives re mediation efforts.						
07-10-2022	JSM	B320 - Plan and Disclosure Statement (including Business Plan)				1.20	1,085.00	1,302.00
		Reviewing TCC position statement on estimation.						
07-10-2022	JSM	B320 - Plan and Disclosure Statement (including Business Plan)				0.40	1,085.00	434.00
		Composing suggestions for TCC position statement on estimation.						
07-11-2022	RSM	B110 - Case Administration				0.10	805.00	80.50
		Correspondence with co-counsel and committee representatives re July 26 hearing preparation.						
07-11-2022	JSM	B320 - Plan and Disclosure Statement (including Business Plan)				0.50	1,085.00	542.50
		Revising brief opposing Debtor's position on estimation.						
07-12-2022	RSM	B110 - Case Administration				0.10	805.00	80.50
		Correspondence with co-counsel and committee representatives re appellate decision in Imerys.						
07-12-2022	RSM	B110 - Case Administration				0.20	805.00	161.00
		Correspondence with co-counsel and committee representatives re case strategy pending appeal.						
07-12-2022	RSM	B110 - Case Administration				0.10	805.00	80.50
		Correspondence with colleague re new talc claimant website.						
07-13-2022	RSM	B110 - Case Administration				0.10	805.00	80.50
		Correspondence with co-counsel re committee member meeting on case updates and progress.						
07-13-2022	RSM	B110 - Case Administration				0.80	805.00	644.00
		Conference with co-counsel re preparing for call with committee members and representatives re case status and strategy, including mediation and pendency of appeal.						
07-13-2022	RSM	B110 - Case Administration				2.00	805.00	1,610.00
		Conference with committee members and representatives re case status and strategy, including mediation and pendency of appeal.						
07-13-2022	JSM	B320 - Plan and Disclosure Statement (including Business Plan)				0.50	1,085.00	542.50
		Revising brief opposing Debtor's position on estimation.						
07-13-2022	JSM	B320 - Plan and Disclosure Statement (including Business Plan)				0.50	1,085.00	542.50
		Reviewing draft brief opposing Debtor's position on estimation.						

Date	Professional	Task	Exhibit	Hours	Rate	Amount
07-13-2022	JSM	B110 - Case Administration		0.80	1,085.00	868.00
		Zoom with TCC counsel regarding legal strategy for mediation and upcoming briefs on estimation and July 26 status conference.				
07-13-2022	JSM	B110 - Case Administration		2.00	1,085.00	2,170.00
		Zoom with TCC members, TCC representatives, and TCC counsel re strategy for next steps in bankruptcy, including mediation, estimation, plan exclusivity.				
07-14-2022	RSM	B160 - Fee/Employment Application		0.20	805.00	161.00
		Worked on fee application for June services.				
07-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,085.00	434.00
		Reviewing amicus brief filed by complex litigation law professors.				
07-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	1,085.00	651.00
		Reviewing amicus brief filed by bankruptcy law professors.				
07-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	1,085.00	542.50
		Reviewing CA3 amicus brief filed by Public Interest.				
07-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	1,085.00	651.00
		Reviewing CA3 amicus brief filed by American Assn for Justice.				
07-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.70	1,085.00	759.50
		Reviewing CA3 amicus brief filed by Erwin Chemerinsky.				
07-15-2022	RSM	B160 - Fee/Employment Application		0.10	805.00	80.50
		Correspondence with colleagues re June fee application papers.				
07-15-2022	RSM	B110 - Case Administration		0.20	805.00	161.00
		Correspondence with co-counsel and colleagues re complying with pro hac vice requirements.				
07-18-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		1.60	1,085.00	1,736.00
		Reviewing draft reply brief in support of request to modify stay.				
07-18-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	805.00	322.00
		Reviewed case specifics for motion to lift stay slides.				
07-18-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.20	805.00	161.00
		Reviewed Crouch objection to continuing preliminary injunction.				
07-18-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.50	805.00	402.50
		Reviewed TCC's statement re revisiting PI order.				
07-18-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	805.00	241.50
		Reviewed Maune Raichle objection to extending PI to non-debtor.				
07-18-2022	RSM	B110 - Case Administration		0.10	805.00	80.50
		Reviewed correspondence to the Court re discovery dispute.				
07-18-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.70	805.00	563.50
		Correspondence with co-counsel re oral argument on appeal of motion to dismiss order.				
07-18-2022	RA	B110 - Case Administration		1.30	200.00	260.00
		Review and research NJ PHV rules and regulations in order to pay R. Morse PHV fees.				
07-19-2022	RA	B110 - Case Administration		0.70	200.00	140.00
		Research regarding updating PHV fees.				
07-19-2022	RSM	B160 - Fee/Employment Application		0.20	805.00	161.00
		Conference with colleague re monthly fee application.				
07-19-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	805.00	241.50
		Correspondence with colleagues re appeal briefs.				

Date	Professional	Task	Exhibit	Hours	Rate	Amount
07-19-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.20	935.00	1,122.00
07-20-2022	RSM	B110 - Case Administration		0.60	805.00	483.00
07-20-2022	RSM	B110 - Case Administration		1.00	805.00	805.00
07-20-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	1,085.00	542.50
07-20-2022	JSM	B110 - Case Administration		0.80	1,085.00	868.00
07-20-2022	JSM	B110 - Case Administration		1.00	1,085.00	1,085.00
07-21-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.00	1,085.00	1,085.00
07-21-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.30	935.00	1,215.50
07-22-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	1,085.00	542.50
07-22-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	1,085.00	542.50
07-22-2022	JSM	B110 - Case Administration		1.20	1,085.00	1,302.00
07-22-2022	RSM	B110 - Case Administration		1.20	805.00	966.00
07-22-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	805.00	241.50
07-22-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	805.00	241.50
07-22-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.30	805.00	241.50
07-22-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	805.00	322.00
07-22-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.80	805.00	644.00
07-22-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.40	805.00	322.00
07-22-2022	RSM	B110 - Case Administration		0.10	805.00	80.50
07-23-2022	JSM	B320 - Plan and Disclosure Statement (including Business Plan)		1.10	1,085.00	1,193.50
07-24-2022	JSM	B320 - Plan and Disclosure Statement (including		1.20	1,085.00	1,302.00

Date	Professional	Task Exhibit A	Hours	Rate	Amount
		Business Plan)			
07-24-2022	JSM	Review draft sur-reply in response to debtor's reply in support of its estimation proposal. B320 - Plan and Disclosure Statement (including Business Plan)	0.20	1,085.00	217.00
07-25-2022	JSM	Email communication with TCC co-counsel re draft sur-reply in response to debtor's reply in support of its estimation proposal. B110 - Case Administration	0.40	1,085.00	434.00
07-25-2022	JSM	Revising proposed powerpoint slides for July 26 conference. B110 - Case Administration	0.50	1,085.00	542.50
07-25-2022	RSM	Zoom with TCC counsel re preparation for July 26 conference. B140 - Relief from Stay / Adequate Protection Proceedings	0.10	805.00	80.50
07-25-2022	RSM	Reviewed draft slides for July 26 court hearing. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.80	805.00	644.00
07-25-2022	RSM	Reviewed Arnold & Itkin brief in support of reversal. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	805.00	402.50
07-25-2022	RSM	Reviewed Alystock brief in support of reversal. B110 - Case Administration	0.10	805.00	80.50
07-25-2022	RSM	Reviewed correspondence with opposing counsel re discovery dispute. B110 - Case Administration	0.10	805.00	80.50
07-25-2022	RSM	Reviewed Crouch objection to estimation proceeding. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	805.00	563.50
07-25-2022	RSM	Reviewed mesothelioma ad hoc group brief in support of reversal. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	805.00	161.00
07-25-2022	RSM	Reviewed Chemerinsky amicus brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	805.00	80.50
07-25-2022	RSM	Reviewed bankruptcy professor group's amicus brief. B110 - Case Administration	0.40	805.00	322.00
07-25-2022	RSM	Correspondence with co-counsel re estimation issues. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	805.00	241.50
07-25-2022	RSM	Reviewed Public Justice's amicus brief in support of reversal. B110 - Case Administration	0.20	805.00	161.00
07-25-2022	RSM	Reviewed TCC response brief re estimation. B110 - Case Administration	0.60	805.00	483.00
07-26-2022	RSM	Conference with co-counsel and committee representatives re preparing for July 26 court hearing. B140 - Relief from Stay / Adequate Protection Proceedings	5.00	805.00	4,025.00
07-26-2022	JSM	Attended remotely portions of court omnibus hearing re estimation, preliminary injunction, and case structure going forward. B110 - Case Administration	6.50	1,085.00	7,052.50
07-26-2022	JSM	Attending Judge Kaplan's status conference remotely via Zoom. B140 - Relief from Stay / Adequate Protection Proceedings	0.70	1,085.00	759.50
07-27-2022	JSM	Reviewing transcript of Imerys July 20 hearing regarding motions to lift automatic stay with respect to non-debtor J&J. B140 - Relief from Stay / Adequate Protection Proceedings	0.70	1,085.00	759.50
07-27-2022	JSM	Reviewing transcript of 3M MDL hearing of July 27 regarding bankruptcy petition filed in SD Indiana. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.10	1,085.00	2,278.50

Date	Professional	Task	Exhibit	Hours	Rate	Amount
		Drafting insert for CA3 reply brief in motion-to-dismiss appeal.				
07-27-2022	RSM	B110 - Case Administration		0.40	805.00	322.00
		Correspondence with co-counsel re developments in Texas two-step cases.				
07-28-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.80	805.00	644.00
		Attended court hearing re rulings on extension of automatic stay, estimation, and court-appointed expert.				
07-28-2022	RSM	B110 - Case Administration		0.90	805.00	724.50
		Conference with committee representatives, committee members, and co-counsel re court hearing and next steps re court-appointed expert.				
07-28-2022	JSM	B110 - Case Administration		0.80	1,085.00	868.00
		Attending zoom conference in which Judge Kaplan announced his rulings on estimation, requests to modify PI, appointment of an expert.				
07-28-2022	JSM	B110 - Case Administration		1.00	1,085.00	1,085.00
		Zoom conference with TCC representatives and members to discuss Judge Kaplan's rulings on estimation, requests to modify PI, appointment of an expert.				
07-28-2022	JSM	B110 - Case Administration		0.50	1,085.00	542.50
		Zoom conference with TCC counsel to discuss Judge Kaplan's rulings on estimation, requests to modify PI, appointment of an expert.				
07-29-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,085.00	325.50
		Email communication with TCC representatives and counsel regarding requests from amici to consent to briefs in support of debtor in Third Circuit appeal.				
07-29-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	935.00	561.00
		Research regarding possible remedies for improper bankruptcy.				
07-31-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,085.00	217.00
		Email communication with TCC counsel regarding CA3 moot court schedule.				
Total						77,533.00

Time Summary

Professional	Hours	Amount
Jonathan Massey	47.20	51,212.00
Matthew Collette	3.10	2,898.50
Rachel Morse	28.50	22,942.50
Rob Aguirre	2.40	480.00
Total Fees		77,533.00

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PRIVILEGED & CONFIDENTIAL

September 18, 2022

Official Committee of Talc Claimants

In re LTL Management, LLC, No. 21-30589
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 08-01-2022 - 08-31-2022

RE: LTL Management Bankruptcy

Time Details

Date	Professional	Task	Hours	Rate	Amount
08-01-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,085.00	217.00
		Email communication with counsel for co-appellants regarding preparations for CA3 argument.			
08-01-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	935.00	1,122.00
		Analyzed possible remedies for improper bankruptcy.			
08-02-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.00	935.00	1,870.00
		Further analyzed possible remedies for improper bankruptcy.			
08-03-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.20	935.00	2,057.00
		Further analyzed possible remedies for improper bankruptcy.			
08-03-2022	RSM	B110 - Case Administration	0.30	805.00	241.50
		Conference with co-counsel re mediation and plan work.			
08-03-2022	RSM	B110 - Case Administration	0.10	805.00	80.50
		Correspondence with committee member representatives re mediation issues.			
08-03-2022	RSM	B110 - Case Administration	0.10	805.00	80.50
		Correspondence with co-counsel re K. Feinberg issues.			
08-03-2022	RSM	B110 - Case Administration	0.10	805.00	80.50
		Correspondence with co-counsel re coordinating with FCR.			
08-03-2022	RSM	B110 - Case Administration	1.00	805.00	805.00
		Conference with committee representatives re appeal work, mediation, debtor's exclusivity extension request, estimation expert, and plan preparation.			
08-04-2022	RSM	B110 - Case Administration	0.10	805.00	80.50
		Correspondence with co-counsel re coordination with FCR.			
08-04-2022	RSM	B110 - Case Administration	0.30	805.00	241.50
		Correspondence with co-counsel re analyses of developments re mass tort bankruptcy maneuver.			
08-04-2022	RSM	B160 - Fee/Employment Application	0.10	805.00	80.50
		Correspondence with colleagues re fee application.			
08-04-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,085.00	217.00
		Email communication with TCC member representative regarding CA3 oral argument scheduling.			

Date	Professional	Task	Exhibit A through H	Page 32 of 48	Hours	Rate	Amount
08-04-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.20	935.00	1,122.00
08-04-2022	MC	Drafted analysis regarding remedies in communication to Jonathan Massey and Rachel Morse.			1.00	935.00	935.00
08-07-2022	JSM	B110 - Case Administration			1.60	1,085.00	1,736.00
08-07-2022	JSM	Continued review of briefs filed for appellant in preparation for reply brief.			0.40	1,085.00	434.00
08-07-2022	JSM	Reviewing legal issue regarding TCC's potential support of debtor's QSF motion.			0.30	1,085.00	325.50
08-08-2022	RSM	B110 - Case Administration			0.20	805.00	161.00
08-08-2022	RSM	Correspondence with co-counsel re FCR information requests.			0.30	805.00	241.50
08-08-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
08-08-2022	RSM	Correspondence with co-counsel re Rule 706 expert order.			0.10	805.00	80.50
08-09-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
08-09-2022	RSM	Correspondence with client representatives re Rule 706 expert.			0.30	805.00	241.50
08-09-2022	MC	B160 - Fee/Employment Application			1.00	935.00	935.00
08-10-2022	JSM	Worked on fee application issue.			1.10	1,085.00	1,193.50
08-10-2022	JSM	Review Erwin Chemerinsky amicus brief in preparation for working on reply brief.			0.60	1,085.00	651.00
08-10-2022	JSM	B110 - Case Administration			0.50	1,085.00	542.50
08-10-2022	JSM	Zoom conference with TCC members and representatives regarding legal strategy and next steps in bankruptcy proceeding.			0.30	1,085.00	325.50
08-10-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	805.00	322.00
08-10-2022	JSM	Telephone conference with Jeff Lamken regarding CA3 reply brief and oral argument.			1.10	805.00	885.50
08-10-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	805.00	80.50
08-10-2022	JSM	Telephone conference with Mike Winograd of Brown Rudnick regarding CA3 reply brief and oral argument.			0.10	805.00	80.50
08-10-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
08-10-2022	RSM	Conference with co-counsel re matters to be discussed with committee members, including Feinberg appointment, mediation, FCR liaising, exclusivity, and QSF.			0.10	805.00	80.50
08-10-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
08-10-2022	RSM	Conference with committee members and member representatives re case status, including Feinberg appointment, mediation, FCR liaising, exclusivity, and QSF.			0.10	805.00	80.50
08-11-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
08-11-2022	RSM	Reviewed Debtor's motion to extend exclusivity period.			0.10	805.00	80.50
08-11-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
08-11-2022	RSM	Reviewed FTI analysis re talc liability estimates.			0.10	805.00	80.50
08-12-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
08-12-2022	RSM	Reviewed order re extension of Debtor's exclusivity period.			0.10	805.00	80.50
08-12-2022	RSM	B100 - Administration			0.50	805.00	402.50
08-12-2022	RSM	Correspondence with committee member representatives re J&J decision to halt sale of talc powder.			0.30	1,085.00	325.50
08-12-2022	RSM	B160 - Fee/Employment Application					
08-15-2022	JSM	Worked on fee submission for June services.					
08-15-2022	JSM	B160 - Fee/Employment Application					
08-15-2022	JSM	Reviewing July 2022 fee application for submission to bankruptcy court.					

Date	Professional	Task	Exhibit A through H	Page 33 of 48	Hours	Rate	Amount
08-15-2022	JSM	B160 - Fee/Employment Application			0.30	1,085.00	325.50
		Revising July 2022 fee application for submission to bankruptcy court.					
08-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	1,085.00	542.50
		Telephone conference with TCC appellate team re coordinating CA3 reply brief drafting.					
08-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.40	1,085.00	1,519.00
		Reviewing debtor's CA3 brief.					
08-15-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
		Reviewed Court's order appointing Rule 702 expert.					
08-15-2022	RSM	B100 - Administration			0.20	805.00	161.00
		Correspondence with co-counsel re estimation of mesothelioma claims.					
08-15-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
		Reviewed TCC's letter to Court re Rule 706 expert.					
08-15-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
		Reviewed US Trustee's statement re appointment of Rule 706 expert.					
08-15-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	805.00	161.00
		Correspondence with colleagues re work on appeal briefing.					
08-15-2022	RSM	B110 - Case Administration			0.20	805.00	161.00
		Correspondence with co-counsel re Rule 706 expert order.					
08-15-2022	RSM	B160 - Fee/Employment Application			0.40	805.00	322.00
		Worked on fee submission for July services.					
08-15-2022	RSM	B160 - Fee/Employment Application			0.20	805.00	161.00
		Correspondence with colleagues re fee submission for July services.					
08-15-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	805.00	161.00
		Reviewed brief of American Association for Justice in support of appeal from district court ruling.					
08-15-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	805.00	322.00
		Analyzed issues re no bankruptcy purpose for appeal.					
08-16-2022	RSM	B110 - Case Administration			2.30	805.00	1,851.50
		Conference with FTI, co-counsel, and Karst Von Oiste re estimation of mesothelioma cases.					
08-16-2022	RSM	B160 - Fee/Employment Application			0.10	805.00	80.50
		Reviewed Debtor's statement on TCC second interim fee applications.					
08-16-2022	RSM	B160 - Fee/Employment Application			0.20	805.00	161.00
		Correspondence with J. Massey re Debtor's statement on TCC second interim fee applications.					
08-16-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
		Analyzed issues re estimation of mesothelioma cases.					
08-16-2022	RSM	B160 - Fee/Employment Application			0.10	805.00	80.50
		Correspondence with local counsel re June fee application.					
08-16-2022	RSM	B160 - Fee/Employment Application			0.10	805.00	80.50
		Correspondence with colleagues re July fee application.					
08-16-2022	RSM	B160 - Fee/Employment Application			0.10	805.00	80.50
		Correspondence with colleagues re supporting documentation for June fee application.					
08-16-2022	RSM	B160 - Fee/Employment Application			0.10	805.00	80.50
		Correspondence with US Trustee re June fee application.					
08-16-2022	RSM	B160 - Fee/Employment Application			0.10	805.00	80.50
		Correspondence with Fee Examiner and counsel re June fee application.					
08-16-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	935.00	280.50
		Call with Jonathan Massey regarding strategy for Third Circuit reply brief.					
08-16-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)			6.20	935.00	5,797.00

Date	Professional	Task	Exhibit A through H	Page 34 of 48	Hours	Rate	Amount
		Draft reply brief section regarding litigation advantage.					
08-16-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.80	1,085.00	868.00
		Reviewing debtor's CA3 appellee's brief.					
08-16-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,085.00	434.00
		Reviewing TCC appellate team comments regarding points to make in reply brief.					
08-16-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			7.20	1,085.00	7,812.00
		Drafting motion to dismiss section of TCC reply brief in CA3.					
08-16-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.50	935.00	1,402.50
		Review appellees' brief.					
08-17-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	805.00	161.00
		Correspondence with co-counsel re developments in law re preliminary injunction in similar bankruptcy proceedings.					
08-17-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	805.00	161.00
		Correspondence with co-counsel re appeal theories in LTL's opposition brief.					
08-17-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	805.00	322.00
		Analyzed new developments in law re preliminary injunction applicability in bankruptcy.					
08-17-2022	RSM	B110 - Case Administration			0.10	805.00	80.50
		Reviewed TCC's statement re Mississippi and Mexico state actions.					
08-17-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	805.00	161.00
		Reviewed portion of States' Opposition to Debtor's Motion for Injunctive Relief.					
08-17-2022	RSM	B110 - Case Administration			0.70	805.00	563.50
		Analyzed argument re estimation of mesothelioma claims.					
08-17-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	805.00	161.00
		Analyzed argument re preliminary injunction.					
08-17-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	805.00	241.50
		Reviewed amicus brief of complex litigation law professors.					
08-17-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.20	805.00	966.00
		Analyzed Debtor's appellate brief re motion to dismiss.					
08-17-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	1,085.00	542.50
		Email communication with TCC appellate team re analysis of LTL appellee's brief.					
08-17-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	1,085.00	542.50
		Zoom with TCC appellate team re analysis of LTL appellee's brief and plans for reply brief.					
08-17-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.50	1,085.00	542.50
		Zoom with TCC appellate team discussing analysis of LTL appellee's brief and plans for reply brief.					
08-17-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			7.90	1,085.00	8,571.50
		Drafting CA3 reply brief on motion to dismiss issues.					
08-18-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			5.70	1,085.00	6,184.50
		Drafting CA3 reply brief on motion to dismiss issues.					
08-18-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	805.00	80.50

Date	Professional	Task Exhibit A through H	Page 35 of 48	Hours	Rate	Amount
		Correspondence with colleagues re moot argument for appeal.				
08-19-2022	RSM	B110 - Case Administration		1.10	805.00	885.50
		Conference with committee member representative and co-counsel re case status and strategy.				
08-19-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.30	805.00	1,046.50
		Conference with committee member representatives and co-counsel re appeal arguments.				
08-19-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		5.80	1,085.00	6,293.00
		Drafting CA3 reply brief on preliminary injunction issues.				
08-19-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.00	1,085.00	2,170.00
		Zoom with TCC members, representatives and counsel re brainstorming session on arguments to make in CA3 reply brief.				
08-19-2022	JSM	B110 - Case Administration		1.10	1,085.00	1,193.50
		Zoom with TCC members, representatives and counsel re next steps in bankruptcy court and legal strategy.				
08-19-2022	JSM	B110 - Case Administration		0.50	1,085.00	542.50
		Zoom with TCC counsel re next steps in bankruptcy court and legal strategy.				
08-19-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.70	935.00	1,589.50
		Participate in brainstorming strategy call with clients and co-counsel regarding Third Circuit reply brief.				
08-20-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		6.80	1,085.00	7,378.00
		Drafting CA3 reply brief on preliminary injunction issue.				
08-21-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		5.50	1,085.00	5,967.50
		Drafting CA3 reply brief on preliminary injunction issue.				
08-22-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		2.10	1,085.00	2,278.50
		Drafting CA3 reply brief on preliminary injunction issue.				
08-22-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.10	1,085.00	2,278.50
		Revising CA3 reply brief on motion-to-dismiss issue.				
08-22-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.10	805.00	80.50
		Correspondence with committee member representatives re preliminary injunction strategy.				
08-22-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.30	935.00	1,215.50
		Analyzed preliminary injunction issue for Third Circuit reply brief.				
08-23-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.60	935.00	2,431.00
		Review draft of preliminary injunction section of Third Circuit reply brief.				
08-23-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.10	1,085.00	1,193.50
		Zoom with counsel for CA3 co-appellants regarding coordination of arguments for reply briefs.				
08-23-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.10	1,085.00	2,278.50
		Telephone conference with TCC counsel appellate counsel to discuss strengths and weaknesses of potential arguments for reply brief.				
08-23-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.60	1,085.00	2,821.00
		Drafting summary of evidence regarding JJCI financial distress.				
08-23-2022	RSM	B160 - Fee/Employment Application		0.30	805.00	241.50
		Prepared for conference with fee examiner re second interim fee application.				
08-23-2022	RSM	B160 - Fee/Employment Application		1.00	805.00	805.00
		Conference with J. Massey and fee examiner re second interim fee application.				
08-23-2022	RSM	B110 - Case Administration		0.20	805.00	161.00

Date	Professional	Task	Exhibit A through H	Page 36 of 48	Hours	Rate	Amount
		Reviewed FTI's analysis re mesothelioma cases for estimation.					
08-23-2022	RSM	B110 - Case Administration			0.20	805.00	161.00
		Analyzed information from committee member representative re mesothelioma.					
08-23-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.10	805.00	80.50
		Reviewed letter from Debtor re discovery requests from states opposing preliminary injunction.					
08-23-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	805.00	241.50
		Reviewed amicus brief bankruptcy law professors in support of Debtor's position.					
08-23-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	805.00	241.50
		Reviewed amicus brief of chamber of commerce and American tort reform association in support of Debtor's position.					
08-23-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	805.00	241.50
		Reviewed amicus brief of national association of manufacturers and product liability advisory counsel in support of Debtor's position.					
08-23-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	805.00	241.50
		Reviewed amicus brief of Washington legal foundation in support of Debtor-appellee.					
08-23-2022	RSM	B160 - Fee/Employment Application			0.20	805.00	161.00
		Worked on monthly fee application for July services.					
08-24-2022	JSM	B110 - Case Administration			1.00	1,085.00	1,085.00
		Zoom with TCC members, representative, and counsel regarding next steps in bankruptcy court and legal strategy.					
08-24-2022	JSM	B110 - Case Administration			0.40	1,085.00	434.00
		Zoom with TCC counsel regarding next steps in bankruptcy court and legal strategy.					
08-24-2022	RSM	B160 - Fee/Employment Application			0.10	805.00	80.50
		Correspondence with colleagues re July fee application work.					
08-24-2022	RSM	B110 - Case Administration			0.40	805.00	322.00
		Conference with co-counsel re mediation and other case developments.					
08-24-2022	RSM	B110 - Case Administration			1.10	805.00	885.50
		Conference with committee members, committee member representatives, and co-counsel re case status and strategy, including appeal, mediation, and other developments.					
08-25-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.40	1,085.00	434.00
		Telephone conference with TCC representative re state of record on PI Order in CA3 appeal and potential for supplementation of record.					
08-25-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	1,085.00	325.50
		Email communication with TCC counsel re impact on CA3 appeal of J&J announcement of spinoff of consumer division.					
08-25-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	805.00	161.00
		Correspondence with co-counsel and client representatives re LTL's financial distress arguments.					
08-25-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	1,085.00	434.00
		Analyzing news reports of spinoff of J&J consumer division for possible inclusion in CA3 reply brief.					
08-26-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.30	1,085.00	2,495.50
		Analyzing prior bankruptcy decisions by members of the CA3 panel.					
08-26-2022	RSM	B110 - Case Administration			0.20	805.00	161.00
		Correspondence with co-counsel re FCR discovery requests.					
08-26-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	805.00	322.00
		Correspondence with co-counsel re panel assigned to hear appeal and related strategy.					

Date	Professional	Task Exhibit A through H	Page 37 of 48	Hours	Rate	Amount
08-26-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.20	805.00	161.00
		Correspondence with co-counsel and client representatives re recent ruling denying stay in similar bankruptcy as pertains to appellate arguments.				
08-26-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	1,085.00	651.00
		Email communication with TCC representatives and counsel re argument panel for CA3 appeal.				
08-26-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.50	1,085.00	542.50
		Telephone conference with Jeff Lamken re division of time for CA3 argument in light of court's scheduling order.				
08-26-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	1,085.00	217.00
		Telephone conference with David Molton re division of time for CA3 argument in light of court's scheduling order.				
08-26-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		0.80	1,085.00	868.00
		Analyzing decision by SD Indiana bankruptcy court denying stay relief in 3M case.				
08-27-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.40	1,085.00	434.00
		Email communication with TCC counsel regarding prior bankruptcy decisions by members of CA3 panel.				
08-29-2022	RSM	B160 - Fee/Employment Application		0.40	805.00	322.00
		Reviewed draft exhibits in support of July services fee application.				
08-29-2022	RSM	B160 - Fee/Employment Application		0.10	805.00	80.50
		Correspondence with J. Daab re necessary revisions to exhibits in support of July services fee application.				
08-29-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.00	935.00	1,870.00
		Review draft of Third Circuit reply brief.				
08-29-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.90	1,085.00	2,061.50
		Analyzing prior bankruptcy decisions by members of the CA3 panel.				
08-29-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.30	1,085.00	1,410.50
		Email communication with TCC counsel regarding substantive arguments in CA3 reply brief.				
08-29-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.00	935.00	935.00
		Review Washington Legal Foundation amicus brief.				
08-29-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		4.20	1,085.00	4,557.00
		Drafting revisions to CA3 reply brief.				
08-30-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		4.60	1,085.00	4,991.00
		Drafting revisions to CA3 reply brief.				
08-30-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings		1.70	1,085.00	1,844.50
		Drafting insert responding to LTL's arguments in its CA3 brief regarding extension of the stay.				
08-30-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.50	1,085.00	1,627.50
		Drafting insert responding to LTL's arguments in its CA3 brief regarding financial distress.				
08-30-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.20	1,085.00	1,302.00
		Drafting insert responding to LTL's arguments in its CA3 brief regarding availability of 524(g) channeling injunction.				
08-30-2022	RSM	B160 - Fee/Employment Application		0.20	805.00	161.00
		Confer with colleagues re fee application work.				
08-30-2022	RSM	B110 - Case Administration		0.10	805.00	80.50
		Correspondence with co-counsel re upcoming conference with K. Feinberg.				

Date	Professional	Task	Exhibit A through H	Page 38 of 48	Hours	Rate	Amount
08-30-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	805.00	241.50
		Reviewed analysis re recent ruling in related bankruptcy action re stay request.					
08-30-2022	RSM	B160 - Fee/Employment Application			0.30	805.00	241.50
		Correspondence with co-counsel and client representatives re appeal brief.					
08-30-2022	RSM	B160 - Fee/Employment Application			0.30	805.00	241.50
		Analyzed Debtor's objection to fee application.					
08-30-2022	RSM	B160 - Fee/Employment Application			0.60	805.00	483.00
		Revised supporting documentation for July fee application.					
08-30-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.40	1,085.00	1,519.00
		Email communication with TCC counsel regarding substantive arguments in CA3 reply brief.					
08-30-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.50	935.00	1,402.50
		Review updated draft of Third Circuit reply brief.					
08-30-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.70	935.00	654.50
		Review Jonathan Massey's comments on draft of Third Circuit reply brief.					
08-31-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			1.50	1,085.00	1,627.50
		Email communication with TCC counsel regarding substantive arguments in CA3 reply brief.					
08-31-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	805.00	241.50
		Reviewed analysis re developments in bankruptcy law re stay of action.					
08-31-2022	RSM	B110 - Case Administration			0.80	805.00	644.00
		Conference with co-counsel re work to prepare for appellate argument, FCR requests, and mediation status.					
08-31-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	805.00	161.00
		Conference with co-counsel small group re preparing for appellate moot argument sessions.					
08-31-2022	RSM	B110 - Case Administration			0.90	805.00	724.50
		Conference with committee representatives re case status and progress, including preparing for appellate argument, FCR requests, responding to court appointed estimation expert, and mediation status.					
08-31-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			3.20	1,085.00	3,472.00
		Drafting sample questions and answers for Jeff Lamken for moot court preparation.					
08-31-2022	JSM	B110 - Case Administration			0.60	1,085.00	651.00
		Zoom with TCC counsel regarding next steps in the case and legal strategy.					
08-31-2022	JSM	B110 - Case Administration			1.00	1,085.00	1,085.00
		Zoom with TCC representatives and counsel regarding next steps in the case and legal strategy.					
08-31-2022	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.50	1,085.00	542.50
		Zoom with TCC representatives and counsel regarding relevance of Judge Silverstein's ruling on the Edley lift-stay motion in the Imerys bankruptcy for the CA3 reply brief.					
Total							150,373.00

Time Summary

Professional	Hours	Amount
Jonathan Massey	94.80	102,858.00
Matthew Collette	27.40	25,619.00
Rachel Morse	27.20	21,896.00
Total		150,373.00

Total for this Invoice 150,373.00

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PRIVILEGED & CONFIDENTIAL

October 11, 2022

Official Committee of Talc Claimants

In re LTL Management, LLC, No. 21-30589
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 09-01-2022 - 09-30-2022

RE: LTL Management Bankruptcy

Time Details

Date	Professional	Task	Hours	Rate	Amount
09-01-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	805.00	241.50
09-01-2022	JSM	Correspondence with co-counsel and client representatives re feedback on draft appellate brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	1,085.00	1,302.00
09-01-2022	JSM	Email communication with TCC counsel regarding substantive arguments in CA3 reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.50	1,085.00	3,797.50
09-01-2022	MC	Drafting sample questions and answers for Jeff Lamken for moot court preparation. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.50	935.00	1,402.50
09-02-2022	MC	Review amicus briefs in support of LTL for Third Circuit first moot court. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	935.00	561.00
09-02-2022	MC	Drafted analysis of issues raised at moot court in Third Circuit appeal. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.10	935.00	2,898.50
09-02-2022	JSM	Attend moot court in Third Circuit case. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.40	1,085.00	3,689.00
09-02-2022	RSM	Revising CA3 reply brief. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	805.00	322.00
09-02-2022	RSM	Correspondence with colleagues re moot argument to prepare for appeal. B190 - Other Contested Matters (excluding assumption / rejection motions)	3.00	805.00	2,415.00
09-02-2022	JSM	Participated in moot argument session to prepare for oral argument on appeal. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.30	1,085.00	325.50
09-02-2022	JSM	Telephone conference with Jeff Lamken re moot court preparation. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.30	1,085.00	1,410.50
		Reviewing comments from Jeff Lamken moot court.			

Date	Professional	Task	Exh	Est	Att	Hours	Rate	Amount
09-03-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)				2.90	1,085.00	3,146.50
09-03-2022	JSM	Drafting outline for Jeff Lamken of answers to questions from 9/02/22 moot court.				3.80	1,085.00	4,123.00
09-03-2022	RSM	Revising CA3 reply brief.				0.70	805.00	563.50
09-04-2022	JSM	Analyzed potential arguments for appeal following first moot session.				0.20	1,085.00	217.00
09-05-2022	JSM	Email communication with TCC counsel re CA3 oral argument.				0.30	1,085.00	325.50
09-05-2022	JSM	Email communication with TCC counsel re CA3 reply brief.				2.10	1,085.00	2,278.50
09-06-2022	JSM	Drafting revisions to CA3 reply brief.				4.80	1,085.00	5,208.00
09-06-2022	JSM	Drafting revisions to CA3 reply brief.				1.30	1,085.00	1,410.50
09-06-2022	JSM	Composing final edits to CA3 reply brief.				1.10	1,085.00	1,193.50
09-06-2022	JSM	Email communication with TCC counsel re final edits to CA3 reply brief.				1.40	1,085.00	1,519.00
09-06-2022	JSM	Zoom with TCC counsel re suggestions and strategy for CA3 oral argument.				1.60	1,085.00	1,736.00
09-06-2022	RSM	Email communication with TCC counsel re revisions to CA3 reply brief.				0.20	805.00	161.00
09-07-2022	RSM	Reviewed proposed revisions to appellate reply brief.				0.10	805.00	80.50
09-07-2022	RSM	Correspondence with committee representatives and co-counsel re appellate briefs.				0.10	805.00	80.50
09-07-2022	RSM	Reviewed court order re limited stay relief.				1.50	805.00	1,207.50
09-07-2022	JSM	Conference with K. Feinberg, committee member representatives, and co-counsel re estimation.				0.50	1,085.00	542.50
09-07-2022	JSM	Zoom with TCC counsel re bankruptcy strategy and next steps.				0.60	1,085.00	651.00
09-07-2022	JSM	Reviewing CA3 reply brief filed by Arnold & Itkin appellants.				0.50	1,085.00	542.50
09-07-2022	JSM	Reviewing CA3 reply brief filed by Deepak Gupta for mesothelioma appellants.				0.40	1,085.00	434.00
09-07-2022	MC	Reviewing CA3 reply brief filed by Rob Pfister for separate group of appellants.				1.20	935.00	1,122.00

Date	Professional	Task	Hours	Rate	Amount
		assumption / rejection motions)			
09-08-2022	JSM	Review amicus and other briefs for upcoming moot court. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.10	1,085.00	1,193.50
09-08-2022	JSM	Email communication with co-appellants re division of argument in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	1,085.00	1,302.00
09-09-2022	JSM	Email communication with TCC counsel re division of argument in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.00	1,085.00	1,085.00
09-09-2022	JSM	Zoom with counsel for co-appellants re division of argument in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.60	1,085.00	651.00
09-09-2022	JSM	Further zoom with counsel for co-appellants re division of argument in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.80	1,085.00	1,953.00
09-09-2022	JSM	Email communication with TCC counsel re division of oral argument time in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,085.00	542.50
09-09-2022	JSM	Telephone communication with Deepak Gupta, counsel for mesothelioma co-appellants, re division of oral argument time in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,085.00	434.00
09-09-2022	JSM	Telephone communication with David Frederick, counsel for Arnold & Itkin co-appellants, re division of oral argument time in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,085.00	434.00
09-09-2022	JSM	Telephone communication with Rob Pfister, counsel for separate co-appellants, re division of oral argument time in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,085.00	434.00
09-09-2022	JSM	Telephone communication with Jeff Lamken, TCC appellate counsel, re division of oral argument time in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.20	1,085.00	217.00
09-09-2022	RSM	Revising form for submission to CA3 re division of oral argument time in CA3. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	805.00	402.50
09-09-2022	MC	Reviewed analysis re argument in favor of reversal on appeal. B190 - Other Contested Matters (excluding assumption / rejection motions)	2.00	935.00	1,870.00
09-10-2022	JSM	Review other parties' briefs in preparation for moot court. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.40	1,085.00	434.00
09-10-2022	JSM	Email communication with TCC counsel regarding CA3 oral argument and UST presentation. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.70	1,085.00	759.50
09-10-2022	RSM	Drafting note for Jeff Lamken, TCC appellate counsel, to provide possible answer to issue to be raised at CA3 oral argument. B190 - Other Contested Matters (excluding assumption / rejection motions)	0.10	805.00	80.50
09-11-2022	JSM	Correspondence with co-counsel re oral argument on appeal. B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	1,085.00	1,302.00
09-11-2022	MC	Drafting note for Jeff Lamken, TCC appellate counsel, to provide possible answer to additional issue to be raised at CA3 oral argument. B190 - Other Contested Matters (excluding assumption / rejection motions)	4.00	935.00	3,740.00

Date	Professional	Task	Excluded from Service	Hours	Rate	Amount
		Prepared to serve as panelist for upcoming moot court by drafting questions based on filed briefs.				
09-11-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.10	805.00	80.50
		Correspondence with colleague re moot argument to prepare for appeal.				
09-12-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.80	935.00	2,618.00
		Participate in moot court for Third Circuit appeal.				
09-12-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.70	805.00	2,173.50
		Participated in second moot court sessions in preparation for oral argument on appeal.				
09-12-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		3.00	1,085.00	3,255.00
		Attending moot court of Jeffrey Lamken in preparation for CA3 argument.				
09-12-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.20	1,085.00	1,302.00
		Drafting suggestions to Jeffrey Lamken and TCC counsel in response to moot court in preparation for CA3 argument.				
09-12-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.10	1,085.00	1,193.50
		Email communication with TCC counsel re content of CA3 argument.				
09-13-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.80	1,085.00	868.00
		Email communication with TCC counsel re content of CA3 argument.				
09-14-2022	RSM	B140 - Relief from Stay / Adequate Protection Proceedings		3.40	805.00	2,737.00
		Attend remotely court hearing re professional fees and re applicability of stay to state actions.				
09-14-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.20	805.00	161.00
		Correspondence with J. Massey re preparing for oral argument on appeal.				
09-14-2022	JSM	B110 - Case Administration		3.90	1,085.00	4,231.50
		Attend omnibus hearing before Judge Kaplan.				
09-14-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,085.00	325.50
		Telephone conference with David Molton regarding Third Circuit argument.				
09-14-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,085.00	325.50
		Telephone conference with Jeff Lamken regarding Third Circuit argument.				
09-14-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.60	1,085.00	651.00
		Email communication with TCC counsel regarding Third Circuit argument.				
09-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.80	1,085.00	868.00
		Drafting notes to TCC counsel regarding comments on moot court answers.				
09-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		1.10	1,085.00	1,193.50
		Zoom with creditors' counsel to answer questions regarding Third Circuit argument and next steps.				
09-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		0.30	1,085.00	325.50
		Preparing for zoom with creditors' counsel to answer questions regarding Third Circuit argument and next steps.				
09-15-2022	RSM	B160 - Fee/Employment Application		0.30	805.00	241.50
		Confer with colleagues re fee application.				
09-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.20	1,085.00	2,387.00
		Attend Jeff Lamken moot in preparation for CA3 oral argument.				
09-15-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)		2.00	1,085.00	2,170.00

Date	Professional	Task	Hours	Rate	Amount
		Attend David Franklin moot in preparation for CA3 oral argument.			
09-16-2022	RSM	B110 - Case Administration	0.10	805.00	80.50
		Reviewed recent court orders.			
09-16-2022	RSM	B110 - Case Administration	0.20	805.00	161.00
		Conference with co-counsel re upcoming meeting with client representatives re case status and strategy.			
09-16-2022	RSM	B110 - Case Administration	1.30	805.00	1,046.50
		Conference with client representatives re case status and strategy, including upcoming appellate oral argument.			
09-16-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.60	1,085.00	1,736.00
		Preparing notes of key joint appendix designations for reference during Jeff Lamken's CA3 oral argument.			
09-17-2022	RSM	B160 - Fee/Employment Application	0.40	805.00	322.00
		Revised draft application for fees for August services.			
09-18-2022	JSM	B195 - Non-Working Travel	4.00	542.50	2,170.00
		Traveling to Philadelphia for Third Circuit oral argument.			
09-19-2022	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.80	935.00	2,618.00
		Listen to oral argument in Third Circuit appeal.			
09-19-2022	RSM	B160 - Fee/Employment Application	0.20	805.00	161.00
		Analyzed requirements for interim fee application.			
09-19-2022	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.90	805.00	2,334.50
		Attended Third Circuit oral argument on appeal.			
09-19-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,085.00	542.50
		Preparing notes for CA3 oral argument.			
09-19-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	4.30	1,085.00	4,665.50
		Attend CA3 oral argument, sitting at counsel table.			
09-19-2022	JSM	B195 - Non-Working Travel	3.40	542.50	1,844.50
		Non-working travel from CA3 oral argument.			
09-21-2022	JSM	B110 - Case Administration	0.70	1,085.00	759.50
		Zoom with TCC counsel to discuss strategy and next steps in the case.			
09-21-2022	JSM	B110 - Case Administration	1.50	1,085.00	1,627.50
		Zoom with TCC members, representatives, and counsel to discuss strategy and next steps in the case.			
09-23-2022	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	0.50	1,085.00	542.50
		Reviewing CA3 transcript for the purpose of ensuring accuracy of court reporter transcription, prior to its submission to CA3.			
09-23-2022	JSM	B110 - Case Administration	0.30	1,085.00	325.50
		Reviewing draft information request to K Feinberg.			
09-23-2022	JSM	B110 - Case Administration	0.20	1,085.00	217.00
		Email communication with TCC counsel regarding draft information request to K. Feinberg.			
09-23-2022	RSM	B110 - Case Administration	0.20	805.00	161.00
		Correspondence with committee representatives re draft estimation information requests.			
09-23-2022	RSM	B110 - Case Administration	0.20	805.00	161.00
		Reviewed ad hoc committee submission to Feinberg re estimation.			
09-27-2022	JSM	B110 - Case Administration	1.20	1,085.00	1,302.00
		Analyzing Funding Agreement provisions and restrictions in the context of creditor plan.			
09-27-2022	JSM	B110 - Case Administration	1.30	1,085.00	1,410.50
		Analyzing J&J indemnification claim filed in Imerys bankruptcy case in D Del.			
09-28-2022	JSM	B110 - Case Administration	0.80	1,085.00	868.00
		Analyzing availability of 524(g) channeling injunction relief to parent J&J.			
09-28-2022	JSM	B110 - Case Administration	0.40	1,085.00	434.00

Date	Professional	Task	Hours	Rate	Amount
		Email communication with TCC counsel regarding availability of 524(g) channeling injunction relief to parent J&J.			
09-28-2022	JSM	B110 - Case Administration	1.00	1,085.00	1,085.00
		Zoom with TCC members and representatives re legal strategy and next steps in bankruptcy.			
09-28-2022	JSM	B110 - Case Administration	0.90	1,085.00	976.50
		Zoom with TCC counsel re legal strategy and next steps in bankruptcy.			
09-28-2022	RSM	B110 - Case Administration	1.00	805.00	805.00
		Conference with co-counsel re case status and strategy, including estimation, discovery disputes, and exclusivity.			
09-28-2022	RSM	B110 - Case Administration	0.90	805.00	724.50
		Conference with committee representatives re case status and strategy.			
09-29-2022	JSM	B110 - Case Administration	0.90	1,085.00	976.50
		Zoom with TCC counsel re legal strategy and next steps in bankruptcy.			
09-29-2022	JSM	B110 - Case Administration	0.80	1,085.00	868.00
		Reviewing email communication from Dan Stolz re legal strategy and next steps in bankruptcy.			
Total					119,775.50

Time Summary

Professional	Hours	Amount
Jonathan Massey	83.00	86,040.50
Matthew Collette	18.00	16,830.00
Rachel Morse	21.00	16,905.00
Total		119,775.50

EXHIBIT “H”

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR
9004-1(b)**

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<p>In Re: LTL MANAGEMENT, LLC, Debtor.</p>	<p>Chapter 11 Case No.: 21-30589 (MBK) Honorable Michael B. Kaplan</p>

CERTIFICATION OF JONATHAN S. MASSEY

Jonathan S. Massey, of full age, certifies as follows:

1. I am a shareholder with the law firm Massey & Gail LLP (“Massey & Gail”) special counsel to the Official Committee of Tort Claimants in the chapter 11 proceedings of LTL Management, LLC.
2. I respectfully submit this certification in support of the third interim application for compensation and reimbursement of expenses of Massey & Gail.
3. In accordance with 18 U.S.C. § 155 and the Rules of this Court, neither I nor any member or associate of this firm has entered into any agreement, either written or oral, express or implied, with the Official Committee of Tort Claimants or any other party in interest, or any attorney of such person, for the purpose of fixing the amount of any fees or other compensation to be allowed out of, or paid from the assets of the Debtors or its estate.

4. In accordance with Section 504 of the Bankruptcy Code, no agreement or understanding exists between me, this firm or any member or associate thereof, on the one hand, and any other person, on the other hand, for a division of such compensation as this firm may receive from the Court herein. No division of fees, as prohibited by Section 504 of the Bankruptcy Code, will be made by me or any member or associate of this firm.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 30, 2022

By: /s/ Jonathan S. Massey
JONATHAN S. MASSEY